

Testimony HB 4763 – HB 4769

Madam Chair and Committee Members:

Thank you for the opportunity to comment on the package of House Bills. While MMA agrees with protecting the health of our children, we respectively opposed the current legislative package because of the issues set out below.

MMA represents about 2,500 members that operate in the full spectrum of manufacturing industries, and which account for 90% of Michigan's industrial workforce. Manufacturing provides about 600,000 direct jobs in Michigan.

Michigan is a manufacturing state. Manufacturing, along with allied industries of mining and utilities, is the largest single sector of the Michigan economy, creating 20% of the gross state product (GSP), or \$76 billion. This contribution is nearly double the contribution of the next largest sector, real estate, with just \$43 billion in GSP.

As we all know, Michigan's economy is struggling significantly in the face of the cost-based global economy. Michigan's unemployment rate continues to rank the highest in the nation at well over 12%. In January and February of this year alone, Michigan has lost more than 84,000 jobs. Considering the nature of the economy and struggles that businesses are facing, why do we want to put another requirement onto companies doing business in Michigan?

MMA has several concerns with the package of bills before you.

- Adding rulemaking authority to this bill is not necessary. The existing Act was able to set out the requirements that needed to be met. MMA believes that if this legislation moves forward, any requirements should be set out specifically in statute.
- The definition of "Chemical of Concern" allows for chemicals to be included in the registry list without credible scientific data to justify their inclusion. Any chemical included on the registry list should be based upon sound science.
- The definition of "children's product" is too broad. The second part of the definition refers to "any consumer product when used that will result in a child being exposed," this language adds an undefined number of products to this act ranging from desks to theater seats to fishing poles.
- There is an exception for motor vehicles, but not one for recreational vehicles such as ATVs, boats, or snowmobiles.
- Finally, MMA does not believe that there will be adequate funding to run a State program of this nature. There are estimates that this type of program would cost around \$500,000 to implement. At a time when Michigan has had to relinquish control of its wetlands program due to inadequate funding, and where the potential exist for an additional 10% cut to GF could occur, we believe it is irresponsible for the State to create new programs.

Additionally, the American Chemistry Council has committed to working with the federal government in modernizing the Toxic Substances Control Act, which authorizes the EPA to control chemicals that pose an unreasonable risk to human health or the environment.

Changes to the Act will apply to all parties throughout the country and will not place Michigan on an island in the lake of commerce. For these reasons, MMA respectfully opposes the package of bills.

Regards,

A handwritten signature in black ink, appearing to read "R. Gross", written in a cursive style.

Randall Gross
Director of Environmental and Regulatory Policy